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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

BRAND LITTLE and ROBIN BURNS,
 Individually and on Behalf of All Others
 Similarly Situated,

Plaintiffs,

v.

**PACIFIC SEAFOOD PROCUREMENT,
 LLC; PACIFIC SEAFOOD PROCESSING,
 LLC; PACIFIC SEAFOOD FLEET, LLC;
 PACIFIC SEAFOOD DISTRIBUTION,
 LLC; PACIFIC SEAFOOD USA, LLC;
 DULCICH, INC.; PACIFIC SEAFOOD –
 EUREKA, LLC; PACIFIC SEAFOOD –
 CHARLESTON, LLC; PACIFIC
 SEAFOOD – WARRENTON, LLC;
 PACIFIC SEAFOOD – NEWPORT, LLC;
 PACIFIC SEAFOOD – BROOKINGS,
 LLC; PACIFIC SEAFOOD – WESTPORT,
 LLC; PACIFIC SURIMI – NEWPORT
 LLC; BLUE RIVER SEAFOOD, INC.;
 SAFE COAST SEAFOODS, LLC; SAFE
 COAST SEAFOODS WASHINGTON,
 LLC; OCEAN GOLD SEAFOODS, INC.;
 NOR-CAL SEAFOOD, INC.; KEVIN LEE;
 AMERICAN SEAFOOD EXP, INC.;
 CALIFORNIA SHELLFISH COMPANY,**

Case No. 3:23-cv-01098-AGT

**JOINT CASE MANAGEMENT
 STATEMENT**

Date: May 30, 2025
 Time: 2:00 p.m.
 Dept: Courtroom A, 5th Floor
 Judge: Hon. Alex G. Tse

1 **INC.; ROBERT BUGATTO**
2 **ENTERPRISES, INC.; ALASKA ICE**
3 **SEAFOODS, INC.; LONG FISHERIES,**
4 **INC.; CAITO FISHERIES, INC.; CAITO**
5 **FISHERIES, LLC; SOUTHWIND FOODS,**
6 **LLC; FISHERMEN'S CATCH, INC.;**
7 **GLOBAL QUALITY FOODS, INC.;**
8 **GLOBAL QUALITY SEAFOOD LLC;**
9 **OCEAN KING FISH INC.; BORNSTEIN**
10 **SEAFOODS, INC.; ASTORIA PACIFIC**
11 **SEAFOODS, LLC; and DOES 30-60,**

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Defendants.

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Plaintiffs Brand Little (“Little”) and Robin Burns (“Burns”) (collectively, “Plaintiffs”) and Defendants Pacific Seafood Procurement, LLC, Pacific Seafood Distribution, LLC, Pacific Seafood Processing, LLC, Pacific Seafood USA, LLC, Dulcich, Inc., Pacific Seafood – Eureka, LLC; Pacific Seafood – Charleston, LLC, Pacific Seafood – Warrenton, LLC, Pacific Seafood – Newport, LLC, Pacific Seafood – Brookings, LLC, Pacific Seafood – Westport, LLC, and Pacific Surimi – Newport LLC (collectively, “Pacific Seafood”), Blue River Seafood, Inc.; Safe Coast Seafoods, LLC; Safe Coast Seafoods Washington, LLC (collectively, “Safe Coast”), Ocean Gold Seafoods, Inc. (“Ocean Gold”), Nor-Cal Seafood, Inc. (“Nor-Cal”), Kevin Lee, American Seafood Exp, Inc. (“ASE”), California Shellfish Company, Inc. and Robert Bugatto Enterprises, Inc. (collectively, “Hallmark”), Alaska Ice Seafoods, Inc. and Long Fisheries, Inc. (collectively, “Fathom Seafood”), Caito Fisheries, Inc. (“Caito Fisheries, Inc.”), Caito Fisheries, LLC, and Southwind Foods, LLC (“Caito Fisheries, LLC/Southwind”), Fishermen’s Catch, Inc. (“Fishermen’s Catch”), Global Quality Foods, Inc. (“Global Quality Foods, Inc.”), Global Quality Seafood LLC (“Global Quality Seafood LLC”), Ocean King Fish Inc. (“Ocean King”), Bornstein Seafoods, Inc. and Astoria Pacific Seafoods, LLC, (collectively, “Bornstein”), jointly submit this Subsequent Joint Case Management Statement pursuant to Civil Local Rule 16-10. Pursuant to the Court’s direction during the February 28, 2025 Case Management Conference, the Parties provide herein a brief update on where things stand regarding certain matters, and incorporate by reference their Joint Case Management Statement (Dkt. 273), filed February 21, 2025, to the extent it contains background information concerning the facts and claims of the case that are useful to the Court.

1. Stipulations

The Court previously entered the Parties’ Stipulated Protective Order. Dkt. 62.

The Parties agreed to, and the Court entered, an ESI protocol for this action on May 15, 2025. Dkt. 335.

The Parties have yet to discuss a deposition protocol, but intend to meet and confer on the matter in short order.

1 The Parties will discuss whether any other Stipulations concerning discovery or case
2 management are necessary, as the case proceeds.

3 **2. Ocean King's Answer, Initial Disclosures and Discovery Responses**

4 On May 20, 2025, the Court denied Ocean King's Motion to Dismiss the Second
5 Amended Class Complaint and vacated the stay of discovery as to Ocean King. (Dkt. 339.) Per
6 agreement with Plaintiffs, Defendant Ocean King will answer the Second Amended Complaint
7 and serve its Initial Disclosures by June 12, 2025. Ocean King has been served Plaintiffs' first set
8 of All-Defendant requests for production of documents ("RFPDs") and interrogatories, a response
9 to which is due on June 30, 2025.

10 **3. Evidence Preservation**

11 The Parties have conducted extensive meet-and-confer meetings concerning ESI issues
12 with the goal of maximizing the efficiency of discovery. Among the issues discussed was the
13 preservation of discoverable ESI and paper documents. The Parties continue to meet and confer,
14 including concerning the specific issues, outlined below. The preservation issues currently known
15 are as follows:

- 16 • Hallmark: Data on the cell phone of Crystal Adams was not preserved when she left
17 Hallmark's employment. This occurred after the filing of this action and Hallmark's
18 receipt of a preservation demand from Plaintiffs, but 10 months prior to the Amended
19 Complaint which added Hallmark as a party. Ms. Adams is alleged in the operative
20 complaint to have engaged in communications in furtherance of the alleged
21 conspiracy. Plaintiffs intend to seek appropriate remedies from the Court regarding
22 Hallmark's failure to preserve evidence on Ms. Adams' cell phone at the appropriate
23 time. Hallmark's position is that Ms. Adams used her personal cell phone, not a
24 company-provided phone, was not reimbursed for her cell phone use by the company,
25 and the company had no policy regarding use of personal cell phones. Therefore, the
26 employee had privacy rights that prevent the employer from demanding access to the
27 text messages on the employee's personal cell phone, and Plaintiffs have not
28

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established that either non-party Hallmark or Ms. Adams had any duty to preserve the text messages that may have been on her personal phone. As ordered by the Court, (Dkt. 338), Hallmark and Plaintiffs met and conferred on May 21, 2025 regarding the need for further preservation instructions to current and former Hallmark employees and agreed to continue meeting and conferring regarding the matter. The parties will seek appropriate remedies from the Court as needed.

- ASE: Plaintiff Little served a June 12, 2024 subpoena on ASE, which sought *inter alia* communications between ASE and other ex vessel buyers concerning ex vessel prices of Dungeness crab in the Pacific NW Area. After being ordered by the Court to do so, (Dkt. 74), Kevin Zheng, owner of ASE, responded, under oath, that he had no responsive documents. It is Plaintiffs' position that, during meet and confer in March and April of 2025, his counsel indicated his uncertainty over whether ASE and Mr. Zheng preserved responsive documents. ASE disputes this characterization and looks forward to the Court's Order on same should Plaintiffs seek it. Plaintiffs are aware of texts between Mr. Zheng that are responsive to above referenced subpoena, but Plaintiffs have not produced them nor identified their participants, despite same being requested in meet and confer discussions; Plaintiffs intend to provide the requested materials and information in the normal course of discovery. Plaintiffs will seek appropriate remedies from the Court at the appropriate time.
- Nor-Cal & Kevin Lee: Nor-Cal did not take measures to acquire from Defendant Kevin Lee—Nor-Cal's former owner and the individual principally involved on Nor-Cal's behalf in the conduct alleged in this case—the text messages and other responsive data from Mr. Lee's mobile device following Mr. Lee's alleged sale of Nor-Cal in March 2024. Mr. Lee is currently abroad, and Nor-Cal's counsel has only indicated to Plaintiffs a possible return in the next couple months, nor do Plaintiffs know whether Mr. Lee will provide his device to Nor-Cal or Plaintiffs. Plaintiffs will seek appropriate remedies from the Court at the appropriate time.

4. Discovery

1 A. Party discovery served subsequent to the Court's February 18, 2025 order lifting the
 2 discovery stay

- 3 • Plaintiffs served a first set of RFPD on all Defendants except Ocean King, on February
 4 21, 2025, which was superseded by an amended first set of RFPDs, which Plaintiffs
 5 served on March 11, 2025, after Plaintiffs' receipt of most Defendants' initial
 6 disclosures.
- 7 • Plaintiffs served a first set of interrogatories on all Defendants, on March 21, 2025.
- 8 • Plaintiffs served on Ocean King the above described amended first set of RFPDs and
 9 first set of interrogatories, on May 21, 2025.
- 10 • All Defendants jointly served a first set of requests for production of documents
 11 ("RFPDs") and a first set of interrogatories on Plaintiffs, on March 17, 2025 and March
 12 19, 2025, respectively.

13 B. Initial disclosures and responses to party discovery served subsequent to the Court's
 14 February 18, 2025 order lifting the discovery stay (Dkt. 259)

15 Initial disclosures have been served by all parties, except Nor-Cal, Kevin Lee, and Ocean
 16 King.

17 Plaintiffs and all Defendants, except Nor-Cal, Kevin Lee, and Ocean King (whose
 18 responses are not yet due), served timely written responses to the foregoing described discovery
 19 requests. Following Nor-Cal and Kevin Lee's failure to respond by the deadlines associated with
 20 Plaintiffs' first set of RFPDs and interrogatories, Plaintiffs agreed to forego seeking a Court order
 21 to compel a response if Nor-Cal and Kevin Lee provided interrogatory responses, without
 22 objection, by May 19th, and responses to the RFPDs, without objection, by May 27th. Nor-Cal
 23 served its Interrogatory responses on May 19th, and Kevin Lee served his interrogatory responses
 24 on May 20.

25 On May 22, 2025, Plaintiffs made an initial production of documents in response to
 26 Defendants' joint RFPDs.

27 No Defendant, other than Southwind, has produced documents in response to Plaintiffs'
 28 first set of RFPDs. Defendants are in the process of collecting potentially responsive documents
 and ESI in response to Plaintiffs first set of RFPDs, which is substantial. The Parties also have
 not yet engaged in or, in some cases, have not yet concluded meet-and-confers regarding agreed-

1 upon custodians, search terms and other requirements of the ESI protocol, necessary to facilitate
2 review and production of responsive discovery. The Parties expect this to occur over the next
3 several weeks, with rolling document productions to begin thereafter, and anticipate completion
4 of document discovery well in advance of March 9, 2026.

5 Plaintiffs have initiated the meet-and-confer process with individual Defendants
6 concerning the specific responses to certain of Plaintiffs requests. Those meet and confer
7 discussions are ongoing.

8 Pacific Seafood, on behalf of all Defendants, have initiated meet and confer concerning
9 Plaintiffs' responses to the joint requests served by all Defendants. Those meet and confer
10 discussions are ongoing.

11 C. Third party discovery

12 Pursuant to the Court's order granting Plaintiffs leave to serve limited discovery in
13 advance of their filing the First Amended Complaint, (Dkt. 61), Plaintiffs served document
14 subpoenas, in June 2024, on the departments of fish and wildlife of Washington, Oregon, and
15 California, as well as on now Defendants Bornstein, Hallmark, ASE, Safe Coast, and Nor-Cal.
16 Plaintiffs produced to all Defendants documents obtained via these subpoenas and Southwind's
17 response to Plaintiffs' subpoena for documents served on March 29, 2023.¹

18 On March 4, 2025, after the Court's order lifting the stay on discovery (Dkt. 259), the
19 Parties served subpoenas on a number of third party Dungeness crab buyers, the departments of
20 fish and wildlife of California, Oregon, and Washington, and certain other third parties.
21 Responses received by Plaintiffs to these subpoenas have been produced by Plaintiffs to
22 Defendants on May 22, 2025. The Parties are engaged in meeting and conferring with several of
23 these subpoena recipients regarding their responses.

24 D. Current discovery related case management issues that the parties wish to be
25 addressed at the case management conference

26
27 ¹ In March of 2023, Plaintiffs served third party subpoenas on certain parties, in response to
28 which only Southwind (then a third party) produced documents in response before the Court's
order granting Pacific Seafood's motion to stay discovery (Dkt. 38).

- Process for resolving party discovery disputes: Defendants wish to discuss with the Court options for adopting a streamlined process for litigating multiple similar discovery disputes shared between many or all Defendants. Plaintiffs do not believe that the Court's joint letter brief procedure needs modification.
- Process for unopposed and partially unopposed non-party requests for fee/cost reimbursements: One non-party has requested that the parties reimburse their attorneys' fees and costs incurred in responding to subpoenas and that any agreement by the parties to do so be memorialized in a court order. Plaintiffs wish to discuss the process for requesting such an order. Defendants believe that any such discussion is premature, and would direct the non-party recipient to Rule 45.

5. Settlement and ADR

Pursuant to stipulation, the Court has referred Plaintiffs and certain Defendants to settlement conferences before Magistrate Judge Spero. The status of such referrals is as follows:

- Safe Coast: Plaintiffs and Safe Coast held a settlement conference before Magistrate Spero on May 20, 2025, and a further conference is set for August 19, 2025. Settlement discussions and material exchanges are ongoing.
- ASE: Plaintiffs and ASE were scheduled to have a settlement conference before Judge Spero on April 29, 2025. Subsequent thereto the parties stipulated to the settlement conference being adjourned. A further settlement conference scheduling conference is set for August 26, 2025.
- Fathom: Plaintiffs and Fathom were scheduled to have a settlement conference before Judge Spero on May 15, 2025. Fathom subsequently requested that the settlement conference be adjourned, and Plaintiffs stipulated to the request. On May 15, 2025, Judge Spero held a scheduling conference for a further settlement conference, at which the settlement conference between Fathom and Plaintiffs was reset for November 13, 2025.
- Fishermen's Catch: A settlement conference is scheduled for August 14, 2025.

There are no other active settlement discussions between Plaintiffs and any Defendant.

6. Scheduling

On March 3, 2025, the Court set the case schedule for this action through a hearing on class certification and *Daubert* motions, provided below for convenience of the Court:

- May 30, 2025: further case management conference;
- August 29, 2025: further case management conference;
- December 5, 2025: further case management conference;
- January 12, 2026: last day to move to join parties or amend pleadings;
- March 6, 2026: further case management conference;
- June 5, 2026: further case management conference;
- September 4, 2026: further case management conference;
- November 9, 2026: fact discovery closes;
- December 4, 2026: further case management conference;
- December 7, 2026: last day to file joint discovery letter briefs relating to fact discovery;
- February 8, 2027: last day to exchange initial expert reports;
- March 5, 2027: further case management conference;
- May 10, 2027: last day to exchange rebuttal expert reports;
- June 4, 2027: further case management conference
- June 21, 2027: last day to exchange reply expert reports;
- July 9, 2027: close of expert discovery;
- August 23, 2027: last day for Plaintiffs to file motion for class certification and all parties to file *Daubert* motions;
- September 3, 2027: further case management conference;
- October 4, 2027: last day for Defendants to file opposition to class certification and all parties to file oppositions to *Daubert* motions;
- November 1, 2027: last day to file replies in support of class certification and *Daubert* motions;

- December 17, 2027: hearing on class certification and *Daubert* motions.

The Parties ask that the deadline of March 9, 2026 for the substantial completion of rolling document production be added to the current case schedule.

At this time, the Parties do not believe any other modifications are necessary. Given various issues relating to discovery, Plaintiffs note that the schedule may ultimately need to be modified and will promptly raise any such issues if and when they arise.

Dated: May 23, 2025

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By: /s/ Stuart G. Gross

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*Attorney for Defendants Nor-Cal Seafood, Inc. and
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8 **ATTESTATION UNDER L.R. 5-1(i)(3)**

9 Pursuant to Civil Local Rule 5-1(i)(3), I attest under the penalty of perjury that the above
10 signatories authorized the use of an electronic signature and concurred in the filing of this
11 document.

13 Dated: May 23, 2025

by: /s/ Stuart G. Gross
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